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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO
individually and on behalf of all similarly
situated,

Plaintiffs,

VS.

GOOGLE LLC,

Defendant.

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Shawn J. Rabin (admitted *pro hac vice*)
Steven M. Shepard (admitted *pro hac vice*)
Alexander Frawley (admitted *pro hac vice*)
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Case No.: 4:20-cv-03664-YGR-SVK

**PLAINTIFFS' ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIAL
SHOULD BE SEALED**

Referral: The Honorable Susan van Keulen

1 Pursuant to Civil Local Rule 79-5, Plaintiffs respectfully ask the Court to consider whether
 2 Google LLC's ("Google") material should be sealed. The material is included within the parties'
 3 joint discovery dispute chart. Due to ECF technical difficulties, the chart was emailed to the Court
 4 on Friday, March 11.

Document Sought to be Sealed	Party Claiming Confidentiality	Portions to be filed under seal	Basis for Sealing Portion of Document
Joint Discovery Dispute Chart	Google	Portions highlighted in yellow	Refers to material designated "Confidential" and "Highly Confidential" pursuant to the Protective Order
Ex. A RFP Chart	Google	Portions highlighted in yellow	Refers to material designated "Confidential" and "Highly Confidential" pursuant to the Protective Order

13 Pursuant to Civil Local Rule 79-5(f), Google, as the Designating Party, bears the
 14 responsibility to establish that its designated material is sealable.

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 16 Dated: March 14, 2022

Respectfully submitted,

17 By: /s/Amanda Bonn

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